

1 THE HONORABLE JAMAL WHITEHEAD
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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10 ATM SHAFIQUL KHALID; XENCARE
11 SOFTWARE, INC.,

12 Plaintiffs,

Case No. 2:24-cv-449

13 v.
14 MICROSOFT CORPORATION, a
15 Washington Corporation,

16 Defendant.

**STIPULATED MOTION FOR
TEMPORARY STAY PENDING
SETTLEMENT**

17
18 NOTED ON MOTION CALENDAR:
19 MAY 24, 2024

20 Plaintiffs ATM Shafiqul Khalid and Xencare Software, Inc. (together “Khalid”) and
21 Defendant Microsoft Corporation (“Microsoft”), through their undersigned counsel, respectfully
22 move this Court to stay all proceedings in the above-captioned case (as well as in the Related
23 Case of *Microsoft Corp. v. Khalid et al.*, 2:24-cv-448) for 30 days. In support of this motion, the
24 Parties state as follows:

- 25 1. The Parties have reached a settlement in principle that will resolve all claims in this
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STIPULATED MOTION TO STAY
CASE NO. 2:24-CV-449

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1 litigation and in the Related Case.

- 2 2. The Parties are currently in the process of drafting and finalizing a formal settlement
3 agreement, which will include the necessary terms and conditions to fully and finally
4 resolve this matter as well as the Related Case.
5 3. The Parties require additional time to finalize the settlement agreement and to execute the
6 necessary documents.
7 4. Staying the litigation at this juncture will conserve judicial resources and avoid
8 unnecessary expenditures by the Parties while they complete the settlement process.
9 5. The Parties anticipate that they will be able to file a stipulation of dismissal with prejudice
10 within 30 days.
11 6. No party will be prejudiced by the requested stay, and the stay will promote judicial
12 economy and efficiency.

13 WHEREFORE, the Parties respectfully request that the Court enter an order staying all
14 proceedings in this case and the Related Case, including all deadlines and hearings, for a period
15 of 30 days to allow the Parties to finalize and execute the settlement agreement and to file a
16 stipulation of dismissal with prejudice.

17 IT IS SO STIPULATED, through counsel of record.

18 Dated: May 24, 2024

19 s/ Heidi B. Bradley

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24 *Attorneys for Defendants ATM Shafiqul*
25 *Khalid and Xencare Software, Inc.*

1 ORDER

2 In light of the parties' representation that they are near a settlement and their stipulation
3 to stay this matter to facilitate this case's settlement, the Court DENIES as MOOT Plaintiff's and
4 Defendant's motions at Dkt. Nos. 13 and 14, respectively, and GRANTS their motion to stay.
5 The parties shall file a joint status report within 30 days of this Order if they have not reached a
6 settlement.

7 IT IS SO ORDERED.

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9 Dated: June 10th, 2024

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13 Jamal N. Whitehead
14 United States District Judge